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USDOC FOR 532/OEA/M. NICKSON-D/K.GAINES USDOC FOR 3131/USFCS/OIO/ANESA/KREISSL USDOC FOR 4530/MAC/ANESA/OSA ICE HQ FOR STRATEGIC INVESTIGATIONS STATE FOR EB/ESP

E.O. 12958: N/A

TAGS: BEXP ETRD ETTC IN

SUBJECT: EXTRANCHECK: POST-SHIPMENT VERIFICATION: ITI LIMITED, NEW

DELHI, INDIA

REF: USDOC 00552

- 11. Unauthorized disclosure of the information provided below is prohibited by Section 12(c) of the Export Administration Act.
- 12. On November 14, 2008, Export Control Officer (ECO) Paul Cushman and FSN Shailendra Srivastava conducted a Post-Shipment Verification (PSV) at Indian Telecom Industries (ITI) Limited, New Delhi.
- 13. BIS requested a PSV at ITI, a Government of India (GOI) entity located at Scope Bhawan, Lodhi Road in New Delhi. ITI was listed as the ultimate consignee for three PRS-4400 Cesium Clocks manufactured by SYMMETRICOM of San Jose, California. Export License: D363595. ECCN: 3A002.
- 14. ECO and FSN Srivastava met with Mr. V.K. Jain, Chief Manager, and Mr. Balmukund Sharma, Engineer, in ITI's conference room. Mr. Randhir Jaiswal, Deputy Secretary, Ministry of External Affairs, arranged and was present at the meeting.
- 15. ITI representatives were familiar with BIS regulations. In October 2005, ECO Michael Rufe conducted a PSV at ITI for a PRS-45 Cesium Beam Frequency Standard System.
- 16. Relative to this transaction, Jain provided copies of the ITI Purchase Order, SYMMETRICOM Invoice, ITI End-Use Statement, Air Waybill, Delivery Challan, and the BIS License Conditions. Jain confirmed that ITI officials understood, had complied with, and would continue to comply with the license conditions. In addition, Jain provided copies of internal documents detailing the transfer of the third clock from ITI's procurement center in Bangalore to their Meerut facility. In consultation with BIS Headquarters, ECO determined that a separate PSV at ITI's Meerut facility was unnecessary.
- 17. Jain explained that these precision timepieces are used to synchronize telecom networking equipment such as voice and data network exchanges manufactured by ITI. The clocks generate highly accurate reference signals for distribution throughout the network.
- $\P 8$. During the meeting, Jain presented the cesium clocks for inspection. The ECO physically verified the serial numbers as 0650008829 and 0651008870.
- 19. Established in 1947, ITI is a public sector company within the GOI's Department of Telecommunications. ITI is a leading manufacturer of telecom equipment for various customers including Mahanagar Telephone Nigam Limited, Bharat Sanchar Nigam Limited, Indian Railways, as well as the power, steel and oil industries. ITI has six manufacturing units and approximately 11,000 employees. A private security force is on duty at this facility 24/365.

110. Recommendation: At the time of this visit, Indian Telecom Industries appeared to be a reliable recipient of this controlled technology. The items on check in New Delhi were physically verified and were being used in a manner consistent with the Export Administration Regulations.
MULFORD